

October 11, 2019

Ms. Marlene H. Dorch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: Notice of Ex Parte, Unlicensed Use of the 6 GHz Band,  
**ET Docket No. 18-295**

Dear Ms. Dorch:

On September 30, 2019, Steven Pickett, CEO of RigNet, Inc. ("RigNet"), Brendan Sullivan, RigNet's Chief Technology Officer and Chief Information Officer, and Jamie Barnett, RigNet's Senior Vice President for Government Services, met with Commissioner Brendan Carr and his legal advisor, Will Adams for a tour of a Valaris 8500-series oil rig, currently being maintained at the Gulf Copper facility in Galveston, Texas. Keith Haydon of T-Mobile, Inc. and members of the Valaris maintenance crew also were present.

Mr. Pickett, Mr. Sullivan and Rear Admiral Barnett discussed with Commissioner Carr and Will Adams the criticality of the 6 GHz backbone for the LTE network in the Gulf of Mexico for the safety of the thousands of crew members working on these platforms and for the safety, security and operability of the platforms themselves. They also discussed how 6 GHz is particularly well-suited for at-sea terrestrial communications networks, but how the peculiar reflective aspects of seawater magnify potential interference in a way that is not problematic on land. They encouraged the FCC to exempt the Gulf of Mexico from the proceeding on the basis of public safety and the unique nature of this at-sea network.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed electronically with your office.

Respectfully submitted

RIGNET, INC.

By: *James Arden Barnett, Jr.*

Raul Magallanes, Assoc. General Counsel  
Brad Eastman, General Counsel  
James Arden Barnett, Jr, RDML USN (Ret)  
Senior Vice President, Government Service

cc: Commissioner Brendan Carr  
Will Adams                      Julius Knapp  
Ira Keltz                         Zenji Nakazawa  
Erin McGrath                    Umair Javed  
William Davenport             Travis Litman  
Aaron Goldberger               Randy Clarke